UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

MONICA MORRISON,

CASE NO. 1:18-cv-06127 (CBA)(RML)

Plaintiff.

v.

ROBERT LANGRICK,

Defendant.

## DEFENDANT ROBERT LANGRICK'S FIRST SET OF REQUESTS FOR ADMISSIONS TO PLAINTIFF MONICA MORRISON

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendant Robert Langrick issues his First Set of Requests for Admissions, to be answered fully, in writing, and under oath by Plaintiff Monica Morrison within thirty (30) days of service. Defendant reserves the right to propound additional requests for admission as may be appropriate.

#### **DEFINITIONS**

- 1. "Ms. Morrison," "you," and "your" mean Monica Morrison, Plaintiff in the above-captioned action, and any present or former agents, representatives, attorneys, and any Person acting or purporting to act on your behalf.
  - 2. "Defendant" means Robert Langrick, Defendant in the above-captioned action.

#### **INSTRUCTIONS**

- 1. Each request is deemed admitted unless, within thirty (30) days from the date of service hereof, you serve a written answer or objection addressed to the matter of the request.
- 2. If a matter is not admitted, the answer must specifically deny it or state in detail why you cannot truthfully admit or deny it.

- 3. A denial must fairly respond to the substance of the matter, and when good faith requires that you qualify an answer or deny only a part of the matter, the answer must specify the part admitted and qualify or deny the rest.
- 4. A response of lack of knowledge or information as a reason for failing to admit or deny may be made only if you state that you have made a reasonable inquiry into the request and that the information you know or can readily obtain is insufficient to enable you to admit or deny the matter.
- 5. If an objection is made, you must state the grounds for the objection. You must not object solely on the ground that the request presents a genuine issue for trial.

#### **REQUESTS FOR ADMISSION**

#### **REQUEST FOR ADMISSION NO. 1**

Admit that you are the author of the July 19, 2018 "Personal Review" of Defendant posted on the website MyLife.com, a copy of which is attached hereto, and which stated the following:

"Rob committed sexual assault with a woman who was 19 years old when he was a business school grad at Tuck and he was in his late 20's. He urinated in the room of the victim and also left drugs in her room, which he attempted to tell police did not belong to him. Afterward, he attempted to pay off the victim with \$200 in cash and an apology note. He was arrested for criminal activity related to the night in question. He also hired a lawyer in attempts [sic] to silence and intimidate his victim, using the threat of a slander lawsuit. He also had his attorney lie on his behalf. His own attorney falsely stated that the police determined that no wrongdoing occurred on the night in question, even though Rob was arrested for drug possession. If you believe that penetrating and attempting anal sex with an unconscious woman is rape, then you would likely call him a rapist. On top of that, he has attempted to avoid accepting responsibility for every single bad decision he has made in relation to this circumstance – going as far as literally blaming the victim for his own criminal activity. It seems that to him, speaking about his criminal activity is more of a violation that [sic] the criminal acts themselves. The irony for all of this is not at all lost on his victim and his victim's attorney."

# **REQUEST FOR ADMISSION NO. 2**

Admit that you created the group on Vimeo.com entitled "rapist," at the URL: <a href="https://vimeo.com/groups/510471">https://vimeo.com/groups/510471</a>, and that you posted a video of Defendant in that group.

Dated: March 14, 2019

### Respectfully Submitted,

#### /s/ Andrew C. Phillips

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Defendant's First Set of Requests for Admissions to Plaintiff Monica Morrison in the above captioned matter was served on the below counsel of record on March 14, 2019, in accordance with the Rules of Civil Procedure:

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Dated: March 14, 2019

By: \( \frac{s/Andrew C. Phillips}{Andrew C. Phillips} \)

Andrew C. Phillips

